

IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION

PROGRESSIVE PREFERRED  
INSURANCE COMPANY,

Plaintiff,

V.

**JMP ENTERPRISES, INC.;  
JOHN MARK PARKER; and  
JENNIFER M. GOLDEN,**

**Defendants.**

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) Civil Action Number: 3:06-CV-00934

**MOTION TO AMEND COMPLAINT**

COMES NOW the plaintiff, Progressive Preferred Insurance Company (“Progressive”), pursuant to Rule 15(a) of the Federal Rules of Civil Procedure, and moves the court for leave to amend its complaint to add late notice as a coverage issue. In compliance with Local Rule 15.1, Progressive is reproducing the entire complaint as amended.

Календарь

**R. Larry Bradford, Attorney for Plaintiff  
Progressive Preferred Insurance Company  
Attorney Bar Code: BRA039**

OF COUNSEL:

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this the 27 day of March, 2007, served a copy of the foregoing on all attorneys of record by placing a copy of same in the United States Mail, postage prepaid and properly addressed as follows:

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OF COUNSEL